

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MECHANICAL LICENSING COLLECTIVE,

Plaintiff,

v.

SPOTIFY USA INC.,

Defendant.

No. 1:24-cv-03809 (AT)

**DECLARATION OF JAY COHEN IN SUPPORT OF PLAINTIFF'S
MOTION FOR LEAVE TO AMEND THE COMPLAINT**

I, Jay Cohen, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, as follows:

1. I am a partner of the law firm of Paul, Weiss, Rifkind, Wharton & Garrison LLP (“Paul, Weiss”), attorneys for Plaintiff Mechanical Licensing Collective (the “MLC”), and I am admitted to practice before this Court. I respectfully submit this Declaration in support of the MLC’s motion pursuant to Fed. R. Civ. P. 15(a) for leave to file a First Amended Complaint.

2. On May 16, 2024, the MLC filed its original Complaint. (Dkt. 1).

3. On January 29, 2025, the Court dismissed the Complaint with prejudice. (Dkt. 61; Dkt. 62).

4. On March 11, 2025, the Court vacated the judgment and permitted the MLC to seek leave to amend the Complaint by April 1, 2025. (Dkt. 74).

5. Attached hereto as Exhibit 1 is a true and correct copy of the MLC’s proposed First Amended Complaint.

6. Attached hereto as Exhibit 2 is redline comparing the MLC's original Complaint to the MLC's proposed First Amended Complaint.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 1, 2025
New York, New York

PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP

By: /s/ Jay Cohen
Jay Cohen